

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:
Larry D. Perryman Sr. and
Ella Louise Perryman
Debtors.

Chapter 13 No. 13-47436
Hon. Walter Shapero

OBJECTIONS TO CONFIRMATION

NOW COMES JPMorgan Chase Bank, National Association, by and through their attorneys, Trott & Trott, P.C., and hereby Objects to Confirmation as follows:

1. That Creditor is a holder of a mortgage on real property owned by the debtor(s) and located at 16600 Bramell St, Detroit, MI 48219-3754;
2. That the Debtor's Plan as proposed will not cure the arrearage within its stated terms as required by 11 U.S.C. Section 1322(b)(5) and 1325(a)(5);
3. That the Debtor's Plan of Reorganization proposes to pay Creditor a regular monthly payment of \$543.88 directly;
4. That according to Creditor's records, Creditor must receive the regular monthly payment of \$580.75 plus a pre-petition arrearage of \$279.92 at the rate of at least \$7.77 per month in order for the arrearage to be cured within a reasonable length of time, i.e., 36 months;
5. That the Debtor's proposed Plan of Reorganization understates the ongoing monthly mortgage payment;
6. That the Debtor's proposed Plan of Reorganization fails to list the pre-petition arrearage and the monthly payment on the pre-petition arrearage;
7. That the Debtor's Plan of Reorganization proposes to pay the mortgage payment directly but the mortgage is not current;
8. That if the Debtor is not proposing to pay the debt owed to Creditor, the Automatic Stay should be vacated so the Creditor may pursue collection activities;

Trott & Trott, P.C.
31440 Northwestern
Hwy
STE 200
Farmington Hills, MI
48334-5422
Phone 248.642.2515
Facsimile 248.642.3628

9. That as of the Bankruptcy filing date the loan was due for April 1, 2013;

10. That the debtor's proposed Plan of Reorganization is underfunded;

WHEREFORE, Creditor prays that Confirmation be denied.

Respectfully Submitted,
Trott & Trott, P.C.

Dated: June 11, 2013

/S/ Crystal Price-Buckley (P69921)

/S/ Laura M. Hawley (P71064)

/S/ Athena Aitas (P61824)

Attorney for JPMorgan Chase Bank,
National Association

31440 Northwestern Hwy Ste 200
Farmington Hills, MI 48334-5422
248.642.2515

Email: EasternECF@trottlaw.com

T&T #181806B03

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